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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY: *g*

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

10 UNITED STATES OF AMERICA,) Criminal Case No. **08 CR 0267 L**
11 Plaintiff,) I N D I C T M E N T
12 v.) Title 18, U.S.C., Sec. 2113(a) -
13 MICHAEL DANIEL LILLY MARTIN (1),) Bank Robbery; Title 18, U.S.C.,
14 MELANIE ELIZABETH DEPALMER (2),) Sec. 2 - Aiding and Abetting
15 Defendants.)

16 The grand jury charges:

17 Count 1

18 On or about October 2, 2007, within the Southern District of
19 California, defendants MICHAEL DANIEL LILLY MARTIN and MELANIE
20 ELIZABETH DEPALMER, by force, violence and by intimidation, did
21 unlawfully take from the person and presence of an employee of Wells
22 Fargo Bank, 8898 Navajo Road, San Diego, California, the sum of
23 approximately \$744.00, belonging to and in the care, custody, control,
24 management, and possession of Wells Fargo Bank, a bank, the deposits
25 of which were then insured by the Federal Deposit Insurance
26 Corporation (FDIC); in violation of Title 18, United States Code,
27 Sections 2113(a) and 2.

28 //

LAC:em:San Diego
1/30/08

Count 2

On or about October 3, 2007, within the Southern District of California, defendants MICHAEL DANIEL LILLY MARTIN and MELANIE ELIZABETH DEPALMER, by force, violence and by intimidation, did unlawfully take from the person and presence of an employee of Washington Mutual Bank, 348 South Twin Oaks Valley Road, San Marcos, California, the sum of approximately \$1,000.00, belonging to and in the care, custody, control, management, and possession of Washington Mutual Bank, a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC); in violation of Title 18, United States Code, Sections 2113(a) and 2.

Count 3

On or about October 4, 2007, within the Southern District of California, defendants MICHAEL DANIEL LILLY MARTIN and MELANIE ELIZABETH DEPALMER, by force, violence and by intimidation, did unlawfully take from the person and presence of an employee of Union Bank of California, 1512 Main Street, Ramona, California, the sum of approximately \$4,000.00, belonging to and in the care, custody, control, management, and possession of Union Bank of California, a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC); in violation of Title 18, United States Code, Sections 2113(a) and 2.

Count 4

On or about October 5, 2007, within the Southern District of California, defendants MICHAEL DANIEL LILLY MARTIN and MELANIE ELIZABETH DEPALMER, by force, violence and by intimidation, did unlawfully take from the person and presence of an employee of Citibank, 3777 Avocado Blvd., La Mesa, California, the sum of

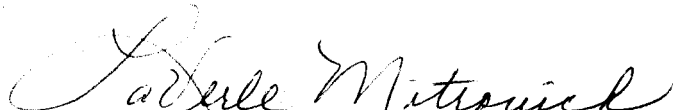
1 approximately \$4,273.00, belonging to and in the care, custody,
2 control, management, and possession of Citibank, a bank, the deposits
3 of which were then insured by the Federal Deposit Insurance
4 Corporation (FDIC); in violation of Title 18, United States Code,
5 Sections 2113(a) and 2.

6 Count 5


7 On or about October 29, 2007, within the Southern District of
8 California, defendants MICHAEL DANIEL LILLY MARTIN and MELANIE
9 ELIZABETH DEPALMER, by force, violence and by intimidation, did
10 unlawfully take from the person and presence of an employee of
11 California Bank & Trust Bank, 135 Saxony Road, Encinitas, California,
12 the sum of approximately \$2,150.00, belonging to and in the care,
13 custody, control, management, and possession of California Bank &
14 Trust Bank, a bank, the deposits of which were then insured by the
15 Federal Deposit Insurance Corporation (FDIC); in violation of
16 Title 18, United States Code, Sections 2113(a) and 2.

17 DATED: January 31, 2008.

18 A TRUE BILL:

19
20 
21 Foreperson Deputy

22 KAREN P. HEWITT
23 United States Attorney

24 By: 
25 LAWRENCE A. CASPER
26 Assistant U.S. Attorney
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